

From: [Larsen, Brent](#)
To: rusty.swafford@noaa.gov
Cc: [Chen, Isaac](#); [Dwyer, Stacey](#)
Subject: Essential Fish Habitat Assessment for EPA Region 6 OCS General Permit
Date: Tuesday, August 29, 2017 3:46:30 PM
Attachments: [R6 GP EFH OCS2017 v08297.docx](#)

Howdy Rusty:

Our Acting Division Director, Jane Watson, reached out to Sarah Furtak for assistance on a pressing need for consultation on Essential Fish Habitat in the Gulf of Mexico and she recommended we contact you. We would like to see what we can to make review of a Essential Fish Habitat Assessment for reissuance of the NPDES General Permit for Oil and Gas Exploration and Production Discharges in the Gulf of Mexico off Louisiana (3 NM) and Texas (9 NM) as easy as possible for you in the hopes of allowing an expedited concurrence.

Our permit is mentioned as part of the BOEM Assessment, which is part of the BOEM NEPA EIS that Region 6 was a cooperating agency for and has now formally adopted. I understand NMFS responded on that Assessment July 10, 2017.

The approach we have taken for our Assessment is to rely primarily on the BOEM Assessment, but supplement with more information on how the permit controls authorized discharges - leading to a conclusion that there would be little if any effect on Essential Fish Habitat. The BOEM Assessment was less specific and essentially said EPA's permit would adequately control the discharges needing NPDES authorization. Unlike the BOEM Assessment, which needed to evaluate all the effects that stem from authorizing drilling in the Gulf, our scope is limited to the discharges that we authorize.

Our time crunch is the need to reissue the permit by September 30, 2017, so the oil and gas industry does not lose the ability to gain coverage for new discharges or transfers of ownership. I've attached our draft 9 page assessment (without the attachments for now), to get your impressions on the best path forward.

Sorry for the incontinence this will cause you, but I would really appreciate your help. If you have any thoughts or questions, please contact me, or Isaac Chen (214-665-7364).

Sincerely,

Brent Larsen
Chief
Permitting Section (6WQ-PP)
214-665-7523